

ENRON CREDITORS
 RECOVERY CORP., *et al.*,
 Reorganized Debtors,
 By Special Litigation Counsel,
 CROWELL & MORING LLP
 153 East 53rd Street
 New York, New York 10022
 (212) 223-4000
 William J. McSherry, Jr. (WM-1194)

**UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK**

Case No. 07 CV 10612

In re

**ENRON CREDITORS
 RECOVERY CORP., *et al.*,
 Reorganized Debtors.**

**ENRON CREDITORS
 RECOVERY CORP., *et al.*,
 Plaintiffs,**

v.

**CITIGROUP INC., *et al.*,
 Defendants.**

**MOTION TO ADMIT COUNSEL
 PRO HAC VICE**

**Bankruptcy Case
 No. 01-16034 (AJG)**

**Adversary Proceeding
 No. 03-09266 (AJG)**

PURSUANT TO LOCAL RULE 1.3(c) of the Local Rules of the United States District Court for
 the Southern and Eastern District of New York, I, William J. McSherry, Jr., a member in good
 standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice
 of:

David M. Stern
 Klee, Tuchin, Bogdanoff & Stern, LLP
 1999 Avenue of the Stars, 39th Floor
 Los Angeles, CA 90067
 (310) 407-1000
 (310) 407-9090

FILED
 U.S. DISTRICT COURT
 S.D. OF N.Y.
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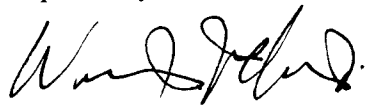
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 #25
 12-12-07
 J.S.

DAVID M. STERN is a member in good standing of the Bar of the State of California

There are no pending disciplinary proceeding against DAVID M. STERN in any State or Federal court.

Dated: December __, 2007
New York, New York

Respectfully submitted,



WILLIAM J. McSHERRY, JR. (WM-1194)
CROWELL & MORING
153 East 53rd Street
New York, New York 10022
(212) 223-4000
(212) 803-4013

ENRON CREDITORS
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 By Special Litigation Counsel,
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**UNITED STATES DISTRICT COURT
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**ENRON CREDITORS
 RECOVERY CORP., *et al.*,
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**ENRON CREDITORS
 RECOVERY CORP., *et al.*,
 Plaintiffs,**

v.

**CITIGROUP INC., *et al.*,
 Defendants.**

**AFFIDAVIT OF WILLIAM J.
 MCSHERRY, JR., IN SUPPORT
 OF MOTION TO ADMIT
 COUNSEL PRO HAC VICE**

**Bankruptcy Case
 No. 01-16034 (AJG)**

**Adversary Proceeding
 No. 03-09266 (AJG)**

STATE OF NEW YORK)
) ss:
 CITY OF NEW YORK)

William J. McSherry, Jr., being duly sworn, hereby deposes and says as follows:

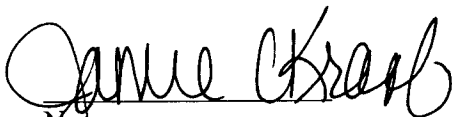
- I am a partner at Crowell & Moring, counsel for Debtor in the above captioned action. I am familiar with the proceedings in this case. I make this statement based upon my personal knowledge of the facts set forth herein and in support of the motion of the

Debtor's motion to admit David M. Stern as counsel pro hac vice to represent Debtors in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in February 1974. I am also admitted to the bar of the United States District Court of the Southern District of New York, and am in good standing with this Court.
3. I have known David M. Stern for approximately one year.
4. Mr. Stern is a partner at Klee, Tuchin, Bogdanoff & Stern, LLP, in Los Angeles, California.
5. I have found Mr. Stern to be both a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of David M. Stern, pro hac vice, to this Court.
7. I respectfully submit a proposed order granting the admission of David M. Stern, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit David M. Stern, pro hac vice,
to represent the Debtor in the above captioned matter, be granted.

Sworn to before me this 10th
Day of December, 2007


Notary

JAMIE C. KRAPP
Notary Public, State of New York
No. 02KR6154451
Qualified in Nassau County
Commission Expires 10/23/2010


WILLIAM J. McSHERRY, JR.



THE
STATE BAR
OF CALIFORNIA

180 HOWARD STREET
SAN FRANCISCO, CALIFORNIA 94105-1639
TELEPHONE (415) 538-2000

December 7, 2007

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, DAVID MARC STERN, #067697 was admitted to the practice of law in this state by the Supreme Court of California on December 18, 1975; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; that the public record states that information has been provided pursuant to Business and Professions Code section 6086.1(c); and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

J. Robert McPhail
Custodian of Membership Records

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 Reorganized Debtors,
 By Special Litigation Counsel,
 CROWELL & MORING LLP
 153 East 53rd Street
 New York, New York 10022
 (212) 223-4000
 William J. McSherry, Jr. (WM-1194)

**UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK**

Case No. 07 CV 10612

In re

**ENRON CREDITORS
 RECOVERY CORP., *et al.*,
 Reorganized Debtors.**

CERTIFICATE OF SERVICE

**Bankruptcy Case
 No. 01-16034 (AJG)**

**ENRON CREDITORS
 RECOVERY CORP., *et al.*,
 Plaintiffs,**

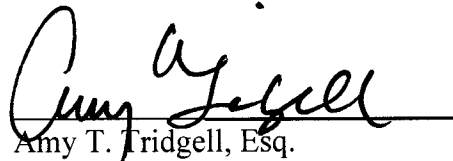
v.

**Adversary Proceeding
 No. 03-09266 (AJG)**

**CITIGROUP INC., *et al.*,
 Defendants.**

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of December 2007, I caused true and correct copies of the foregoing (i) Motion to Admit Counsel Pro Hac Vice; (ii) Affidavit of William J. McSherry, Jr. in Support of Motion to Admit Counsel Pro Hac Vice; (iii) Certificate of Good Standing for David M. Stern, Esq.; and (iv) a proposed Order for Admission of Counsel Pro Hac Vice to be served on counsel of record by hand delivery and on counsel of record for Delta in Philadelphia, Pennsylvania by via overnight U.S. mail, postage prepaid, return receipt requested.

A handwritten signature in black ink, appearing to read "Amy Fridgell", written over a horizontal line.

Amy T. Fridgell, Esq.

Crowell & Moring

153 East 53rd Street

New York, New York 10022

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Case No. 07 CV 10612

In re

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

**ENRON CREDITORS
RECOVERY CORP., *et al.*,
Reorganized Debtors.**

**Bankruptcy Case
No. 01-16034 (AJG)**

**ENRON CREDITORS
RECOVERY CORP., *et al.*,
Plaintiffs,**

**Adversary Proceeding
No. 03-09266 (AJG)**

v.

**CITIGROUP INC., *et al.*,
Defendants.**

Upon the motion of William J. McSherry, Jr., attorney for Enron Creditors Recovery Corporation, et al., and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

David M. Stern
Klee Tuchen Bogdanoff & Stern LLP
1999 Avenue of the Stars, 39th Floor
Los Angeles, California 90067
Telephone: (310) 407-4000
Fax: (310) 407-9090
DStern@ktbslaw.com

is admitted to practice pro hac vice as counsel for Enron Creditors Recovery Corporation, et al., in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing the discipline of attorneys. If this action is assigned to the

Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of the Court.

Dated: December __, 2007
New York, New York

United States District Judge